

ATTACHMENT 2

REDACTED – FOR PUBLIC INSPECTION

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EX PARTE

April 3, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked several questions about the data provided in Verizon's March 27 Response.¹ The attached exhibits and information below respond to staff's questions.

Exhibit 1.A.1.a contains the same data Verizon submitted on March 27, 2007 as the worksheet labeled "VZ Residential Retail" in Exhibit 1.A.1 (legacy Verizon residential retail lines), however, Exhibit 1.A.1.a disaggregates volumes in Pennsylvania and Virginia by areas served by the former Bell Atlantic and the former GTE. The remaining worksheets submitted in Exhibit 1.A.1 of Verizon's March 27 Response show residential retail lines that are presubscribed to Verizon Long Distance; these worksheets represent legacy Verizon retail lines only and do not include those lines served by the former MCI. Verizon does not have data to disaggregate these volumes by areas served by the former Bell Atlantic and the former GTE in Pennsylvania and Virginia.

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), attached to Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

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Exhibit 1.A.2.a contains the same data that Verizon submitted as Exhibit 1.A.2, for Pennsylvania and Virginia (legacy Verizon residential retail lines for which Verizon Long Distance is not the PIC), however, Exhibit 1.A.2.a disaggregates volumes by areas served by the former Bell Atlantic and the former GTE.

Exhibit 1.A.3.a contains the same data that Verizon submitted as Exhibit 1.A.3, for Pennsylvania and Virginia (legacy Verizon residential retail lines for which no PIC is identified), however, Exhibit 1.A.3.a disaggregates volumes by areas served by the former Bell Atlantic and the former GTE.

Exhibit 2.A contains the same data that Verizon submitted as Exhibit 2, for Pennsylvania (wholesale residential lines that are presubscribed to Verizon Long Distance), however, Exhibit 2.A disaggregates volumes by areas served by the former Bell Atlantic and the former GTE. Data for Virginia are not available.

Exhibit 1.H is the December 2005 Yankee Group report² that Verizon cited in response to Specification 1.h (at footnote 19), and in Verizon's February 15, 2007 ex parte.³ The Yankee Group found that wireless subscribers make 64 percent of their long-distance calls and 42 percent of their local calls on their wireless phones.⁴

Wireline Competition Bureau Staff also requested clarification of certain data. With respect to the residential E911 listings data provided in Exhibit 1.F.1 for Idaho, [BEGIN
HIGHLY CONFIDENTIAL]

[END HIGHLY CONFIDENTIAL]. Verizon is gathering data that address the remaining issues, and will submit them to the Commission as they become available.

Exhibits 1.A.3.a and 1.H contain Confidential Information and have been marked "CONFIDENTIAL – SUBJECT TO FIRST PROTECTIVE ORDER" in accordance with the First Protective Order in this proceeding.⁵ Exhibits 1.A.1.a, 1.A.2.a, and 2.A contain Highly Confidential Information and have been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.⁶

² K. Griffin, Yankee Group, *Pervasive Substitution Precedes Displacement and Fixed-Mobile Convergence in Latest Wireless Trends* (Dec. 2005) ("December 2005 Yankee Group Report").

³ Letter from Dee May, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112, at 8 fn.47 (Feb. 15, 2007).

⁴ *December 2005 Yankee Group Report* at 5 and Exhibit 3 (attached as Exhibit 1.H).

⁵ *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, First Protective Order, WC Docket No. 02-112, DA 07-1387 (rel. Mar. 23, 2007).

⁶ *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23, 2007).

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Page 3

If you have any questions, please call me at 202-515-2467.

Very truly yours,

Joseph Jack

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ATTACHMENT 3

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*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked several questions about the data provided in Verizon's March 27 Response.¹ The attached exhibits and information below provide additional responses to staff's questions.²

Wireline Competition Bureau Staff had requested the disaggregation of certain data for Pennsylvania and Virginia by areas served by the former Bell Atlantic and the former GTE. Verizon's April 3 Submission contained this disaggregation for most data associated with presubscribed legacy Verizon residential lines, with the exception of legacy Verizon residential retail lines that are presubscribed to Verizon Long Distance (worksheets by state provided in Exhibit 1.A.1 of Verizon's March 27 Response). Although Verizon Long Distance does not maintain data disaggregating subscriber lines by areas served by the former Bell Atlantic and the

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), *attached to* Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

² Verizon also submitted additional exhibits and information on April 3, 2007. *See* Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Apr. 3, 2007) ("Verizon's April 3 Submission").

former GTE, the attached Exhibit 1.A.1.b provides an estimate of this disaggregation. The estimate applies to the Pennsylvania and Virginia totals reported in Exhibit 1.A.1 of Verizon's March 27 Response, the average former Bell Atlantic/former GTE allocation of Exhibit 1.A.2.a (legacy Verizon residential retail lines for which Verizon Long Distance is not the PIC) and Exhibit 1.A.3.a (legacy Verizon residential retail lines for which no PIC is identified), for each state and time period.

Verizon's March 27 Response contained residential E911 listings data for most states in Verizon's service area (Exhibit 1.F.1). In the four states for which these data were not available for the time period requested by the Commission in Specification 1.f, Verizon submitted LNP data (Exhibit 1.F.2). Wireline Competition Bureau Staff requested that Verizon provide estimates for the number of facilities-based residential lines served by CLECs where Verizon submitted incomplete or no E911 listings data.

The attached Exhibit 1.F.3 contains estimates in response to the staff's request. In states where E911 listings data for 2003 are not available,³ Verizon provided an estimate for December 2003 based on the growth rate of residential E911 listings experienced between December 2004 and December 2005, in each respective state. In Rhode Island, where E911 listings data are only available through 2005, Verizon estimated the December 2006 volume by applying the growth rate of residential E911 listings experienced between December 2004 and December 2005 in that state.

In Arizona, Idaho, Michigan, Nevada, Ohio, and South Carolina, E911 listings data are only available beginning with January 2007. For these states, Verizon relied on the average monthly growth rate of residential E911 listings experienced between January 2007 and March 2007, in each respective state, and applied this trend to the residential E911 listings data for January 2007, to estimate data for December 2003 through December 2006. [BEGIN HIGHLY CONFIDENTIAL]

[END

HIGHLY CONFIDENTIAL]

E911 listings data are not available for Connecticut and Vermont across all time periods requested by the Commission; for these states, Verizon provided the total number of local numbers ported to competitors. Wireline Competition Bureau Staff suggested the use of an alternate source for these data, such as White Pages Directory Listings. Verizon does not at this time have access to White Pages Directory Listings data that would be sufficient to respond to the Commission's March 13 Information Request. White Pages Directory Listings data also understate the extent of facilities-based competition, because, for example, consumers may request unlisted telephone numbers or a CLEC may not request that an access line be listed. White Pages data also may overstate the extent of facilities-based competition, for example, where a customer subscribes to multiple listings for the same telephone line.

³ As described in Verizon's response to Specification 1.f, these data were unavailable for California, Illinois, Indiana, North Carolina, Oregon, Texas, Washington, and Wisconsin.

Wireline Competition Bureau Staff also suggested that estimates might be based on data reported in the FCC's Local Competition Reports. Exhibit 1.F.3 contains estimates for the number of facilities-based residential lines CLECs serve in Connecticut and Vermont on this basis. For December 2003 through December 2005, the number of facilities-based CLEC lines (reported by the FCC in Table 18) was multiplied by the percentage of CLEC lines that are residential (reported by the FCC in Table 11 or 12), and data for MCI were subtracted (based on MCI's Form 477 submissions). The resulting estimate of facilities-based residential CLEC lines was allocated to Verizon's franchise area within the state based on the proportion of residential switched access lines within a state that is served by Verizon (based on ARMIS Report 43-08, Table III). For December 2006, the average monthly growth rate for facilities-based CLEC lines reported by the FCC for December 2005 through June 2006 was applied to an estimate of facilities-based residential CLEC lines for June 2006. Volumes for MCI were not subtracted for the June 2006 and December 2006 periods, because the FCC's report does not classify MCI as a CLEC beginning with the June 2006 data period.

Verizon is not able to validate the estimates provided in Exhibit 1.F.3. This methodology may not accurately reflect the extent of facilities-based competition within Verizon's service area. For example, the methodology assumes that the CLECs' data collected by the FCC are distributed evenly throughout a state, even though the amount of competition within another ILEC's service area within that state may differ from the amount in Verizon's service area. As another example, as shown in Exhibit 1.F.3, this methodology applies statewide trends, such as the decline in facilities-based residential lines in Connecticut (which may be due to the exclusion of AT&T data beginning with December 2005), to Verizon's franchise area, even though this may not be an accurate representation of the competitive trends in Verizon's franchise area within the state. In addition, as the Commission notes in the *June 2006 Local Competition Report*, CLEC data prior to June 2005 may be incomplete.⁴ Estimates for Vermont for 2003 and 2004 are not available because data were withheld from the Local Competition Report to maintain confidentiality.

Verizon continues to gather data that address the remaining issues for which the Wireline Competition Bureau Staff requested clarification, and will submit them to the Commission as they become available.

Verizon is also submitting Exhibit 1.G.1, which provides an estimate of subscription-based over-the-top VoIP subscribers, for each Verizon franchise area, for each quarter between year-end 2004 and the fourth quarter of 2006. This exhibit adds data for the third and fourth quarters of 2006 to the data provided as Exhibit 1.G to Verizon's March 27 Response, based on a newly released estimate by Bernstein Research of nationwide VoIP subscribers.⁵

⁴ Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *Local Telephone Competition: Status as of June 30, 2006* at Table 18, note (Jan. 2007).

⁵ See C. Moffett, et al., Bernstein Research, *VoIP: The End of the Beginning* at Exhibit 1 (Apr. 3, 2007) (estimating non-cable VoIP lines).

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Exhibits 1.A.1.b and 1.F.3 contain Highly Confidential Information and have been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.⁶

If you have any questions, please call me at 202-515-2467.

Very truly yours,

A handwritten signature in cursive script, reading "Joseph Jack". The signature is written in dark ink and is positioned below the typed name "Joseph Jack".

Enclosures

⁶ Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23, 2007).

EXHIBIT 1.A.1.b

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EXHIBIT 1.F.3

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EXHIBIT 1.G.1

ESTIMATE OF OVER-THE-TOP VOIP LINES IN VERIZON'S FRANCHISE AREA

STATE	4Q04	1Q05	2Q05	3Q05	4Q05	1Q06	2Q06	3Q06	4Q06
Arizona	44	71	90	111	141	174	200	218	233
California	19,040	30,330	39,525	48,764	56,731	69,634	77,053	83,820	88,214
Connecticut	171	272	362	446	505	620	678	737	785
Delaware	1,389	2,212	2,966	3,659	4,499	5,523	6,788	7,385	7,867
District of Columbia	1,424	2,269	2,787	3,438	4,158	5,104	5,920	6,440	6,861
Florida	8,756	13,948	17,936	22,128	25,799	31,667	36,240	39,423	39,794
Idaho	402	641	848	1,046	1,182	1,450	1,724	1,876	2,025
Illinois	3,380	5,384	7,634	9,419	9,565	11,740	14,269	15,522	15,892
Indiana	3,152	5,021	6,766	8,347	8,666	10,637	14,202	15,450	16,098
Maine	2,127	3,388	4,888	6,030	7,633	9,369	10,626	11,559	12,315
Maryland	11,681	18,607	24,300	29,980	36,579	44,898	51,776	56,324	60,007
Massachusetts	16,876	26,883	33,199	40,959	48,436	59,452	65,485	71,237	75,894
Michigan	3,290	5,241	7,623	9,405	10,575	12,980	12,889	14,021	14,737
Nevada	167	266	365	450	542	666	763	830	929
New Hampshire	3,214	5,120	6,592	8,133	9,752	11,970	13,260	14,425	15,368
New Jersey	20,582	32,787	42,013	51,834	61,714	75,749	85,184	92,666	98,619
New York	37,140	59,164	76,994	94,991	110,780	135,976	156,983	170,771	180,614
North Carolina	1,317	2,097	2,770	3,418	3,999	4,909	4,459	4,851	5,138
Ohio	3,494	5,566	7,486	9,236	11,233	13,788	15,031	16,352	17,225
Oregon	1,990	3,171	3,942	4,863	6,182	7,587	8,523	9,272	9,829
Pennsylvania	17,463	27,818	36,454	44,974	56,088	68,844	78,879	85,807	91,283
Rhode Island	2,475	3,942	5,241	6,467	7,360	9,035	9,837	10,701	11,401
South Carolina	777	1,237	1,634	2,016	2,436	2,990	3,431	3,732	3,697
Texas	6,067	9,665	13,051	16,101	17,690	21,714	25,512	27,753	28,851
Vermont	1,077	1,715	2,272	2,803	3,418	4,196	4,633	5,040	5,370
Virginia	12,969	20,660	26,818	33,087	40,016	49,117	55,430	60,298	63,705
Washington	3,529	5,622	7,192	8,873	10,876	13,350	15,000	16,318	16,924
West Virginia	2,327	3,708	4,918	6,068	7,467	9,165	10,647	11,582	12,340
Wisconsin	2,112	3,365	4,486	5,535	6,484	7,959	8,987	9,776	10,309
TOTAL	188,430	300,170	391,152	482,581	570,507	700,262	794,410	880,951	915,208

Sources

(1) Nationwide VoIP subscriber estimates by Bernstein Research:

J. Halpern, et al., Bernstein Research, *Quarterly VoIP Monitor: The "Real" Price Gap for VoIP Driving Rapid Subscriber Growth* (July 15, 2005) (4Q04)

C. Moffett, et al., Bernstein Research, *Quarterly VoIP Monitor: Six Million and Counting at Exhibit 1* (June 12, 2006) (1Q05)

C. Moffett, et al., Bernstein Research, *Quarterly VoIP Monitor: Playing Follow the Leader (...Cablevision, That Is)* at Exhibit 17 (Sept. 20, 2006) (2Q05-2Q06)

C. Moffett, et al., Bernstein Research, *VoIP: The End of the Beginning* at Exhibit 1 (Apr. 3, 2007) (3Q06-4Q06)

(2) Residential high-speed Internet access lines by state:

Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status as of December 31, 2004* at Table 11 (July 2005) (4Q04 and 1Q05 allocation)

Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status as of June 30, 2005* at Table 13 (Apr. 2006) (2Q05 and 3Q05 allocation)

Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status as of December 31, 2005* at Table 13 (July 2006) (4Q05 and 1Q06 allocation)

Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status as of June 30, 2006* at Table 13 (Jan. 2007) (2Q06, 3Q06, and 4Q06 allocation)

(3) Residential switched access lines by state, by reporting ILEC:

ARMIS Report 43-08, Table III (2004 data) (4Q04-3Q05 allocation)

ARMIS Report 43-08, Table III (2005 data) (4Q05-3Q06 allocation)

ARMIS Report 43-08, Table III (2006 data) (4Q06 allocation)

ATTACHMENT 4

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EX PARTE

April 11, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked Verizon to supplement its March 27 response to specification 4 of the Commission's March 13 information request by providing data from Harte-Hanks. The attached exhibits and information below respond to staff's request. These data further confirm that all segments of the business market are competitive and that Verizon is non-dominant in each segment, based on the levels at which the Commission has previously made findings of non-dominance.¹

¹ When the Commission declared AT&T to be non-dominant in the provision of domestic interstate interexchange services, AT&T's market share of such services was estimated to be approximately 60 percent. *Motion of AT&T Corp. To Be Reclassified as a Non-Dominant Carrier*, Order, 11 FCC Rcd 3271, ¶ 67 (1995). Likewise, AT&T's share of the international message telephone service market was estimated to be 60 percent when AT&T was declared non-dominant in the provision of those services, and AT&T's average market share in 76 select countries was 74 percent, and AT&T faced no competition at all in four countries. *Motion of*

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Harte-Hanks compiles data from telephone interviews of on-site personnel in IT and telecommunications departments for 500,000 business sites. Attachment A contains an overview of that data. The attached data (Exhibit 4.4) sets forth the percentage of customer sites at which a carrier is a provider for the following product segments: T-1, T-3, Frame Relay, ATM, Long-Distance, and VPN.² Data are provided separately for businesses with up to 500 employees, and businesses with more than 500 employees.³ These data are presented for each of the 28 states in which Verizon provides local wireline telephone service plus the District of Columbia, and for each of the MSAs within those states. Within each individual state (but not MSA), data are provided separately for Verizon's in-franchise service territory and out-of-franchise territory.

The Harte-Hanks data are "unweighted." The Harte-Hanks database purposely overrepresents businesses that are sophisticated and extensive users of telecommunications and IT and underrepresents those that are not. It is not "designed to create a statistically accurate and significant representation of the telecommunications installation universe." (Att. A) In addition, the "unweighted" database contains information only for those sites that choose to participate, and is not adjusted to account for sites that refuse to participate. Moreover, in a number of cases, the sample sizes are too small to yield statistically significant results. As a general matter, a sample size of less than 30 may not be statistically significant.⁴ Verizon is providing all of the data regardless of sample size, even where it is not statistically significant.

Customer share data treat all customers as equal and do not differentiate between customers who spend more and those who spend less. Moreover, the data do not distinguish among the different providers of a single customer. For example, large business customers often have more than one provider of local service (e.g., a primary provider and a secondary provider that functions primarily as a backup). The Harte-Hanks "customer share" data count the two providers equally. For these reasons, two providers with equal "customer shares" might have very different shares of revenues and/or lines.

AT&T Corp. To Be Declared Non-Dominant for International Service, Order, 11 FCC Rcd 17963, ¶ 40 (1996).

² For example, for T1 and T3 lines, respondents were asked to list their providers. In the case of long distance, respondents were asked to provide only their "primary provider." See Att. A.

³ The segment in which a business is classified is based on the number of employees that the business has nationwide rather than the number of employees at the customer site being surveyed. Thus, a local office (with 15 employees) of a national business with 1000 employees is counted in the "more than 500 employees" segment. The local office's answers reflect what providers it uses at the local office, not what the business uses nationally.

⁴ The "totals" shown in Exhibit 4.4 do not represent the number of sites surveyed, but the number of providers named by the respondents. For example, if customer site A identified two T1 providers and customer site B identified three T1 providers, the total shown would be five, not two.

Finally, the Harte-Hanks data do not include all forms of competition. For example, the enclosed survey data does not reflect the use of wireless services by business customers, even though many businesses now make extensive use of wireless phones even if that is not currently their "primary" telecommunications service. In addition, the attached data for long distance do not reflect the use of high speed Internet services that are used by businesses for e-mail and other applications that displace the use of traditional voice services. Similarly, the data are simply a snapshot of current providers, and therefore ignore the dynamic nature of the business and the many new options – such as cable, wireless, and VoIP – that business customers can increasingly use going forward.

If you have any questions, please call me at 202-515-2467.

Very truly yours,

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Enclosures

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ATTACHMENT A

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EXHIBIT 4.4

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EX PARTE

April 12, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

This letter supplements Verizon's March 27, 2007 response to specification 5 of the Commission's March 13 information request.

With respect to specification 5.a, the attached spreadsheet (Exhibit 5.1), provides Verizon Business's estimates of total long-distance voice revenues generated by enterprise customers, as well as estimates of Verizon Business's own long-distance voice revenues generated by enterprise customers. These data represent revenues generated by enterprise customers as a whole; Verizon Business has no way to distinguish "national, multi-location enterprise customers" from other types of enterprise customers. Verizon Business does not have data on the market share of each of its competitors for long-distance voice services.

With respect to specification 5.b, Exhibit 5.1 provides Verizon Business's estimates of total revenues for long-haul services, as well as estimates of Verizon's Business's own long-haul revenues. For purposes of this response, long-haul revenues represent the total of voice long distance, fast-packet services (ATM, Frame Relay, Ring, and Ethernet services), and Core Data services (Private Line and Conferencing services). Verizon Business does not have data on the market share of each of its competitors for long-haul services.

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EXHIBIT 5.1

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